

# **EXHIBIT 4**

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA  
CHARLESTON DIVISION**

IN RE: ETHICON, INC. PELVIC REPAIR SYSTEM PRODUCTS LIABILITY LITIGATION	MDL NO. 2327
<b>This document relates to:</b>  <b>Dina Sanders Bennett,</b>  <b>Plaintiffs,</b>  <b>vs.</b>  <b>ETHICON, INC., et al,</b>  <b>Defendants.</b>	<b>CASE NO.: <u>2:12-cv-00497</u></b>

**DECLARATION**

1. My name is Dina Bennett and I am a resident of Louisiana. I am the Plaintiff in the above-captioned matter. I am forty-six years old and have had several pelvic examinations by multiple physicians throughout my adulthood.

2. I travelled to Dearborn, Michigan on February 29, 2016 and was examined by Dr. Salil Khandwala, the physician selected by Ethicon for a pelvic exam.

3. The visit and examination with Dr. Khandwala took approximately 90 minutes.

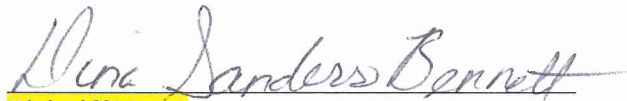
4. The exam itself was unlike any pelvic exam I had ever experienced previously as a result of the following:

a. At one point during my examination, Dr. Khandwala used a long, thin wooden stick and proceeded to touch me on my leg and say “see, that doesn’t hurt.” Dr. Khandwala then took the stick and probed the inside of my vagina. One area the doctor probed was moderately painful. However, when he used the stick to push on the back of

my vagina, it caused me to jump back in pain. It hurt so bad, and felt like pain I had never felt before. He proceeded to use the stick again to push on the back of my vagina, but this time with his fingers pushing on my abdomen. Again, this was extremely painful. I do not ever recall feeling this type of pain in any other exam with any other doctor.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on this 9 day of March, 2016.

  
Plaintiff Name